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**UNITED STATES DISTRICT COURT FOR THE DISTRICT OF WYOMING**

MARTIN CHAPARRO, and )  
JAMES GOULD and ERIN GOULD, )  
and ERIN GOULD as natural guardian ) Civil Action No. 08 CV - 049B  
for FRANK GOULD and )  
JASMINE GOULD, )  
Plaintiffs, )  
vs. )  
COLORADO CASUALTY INSURANCE )  
COMPANY, )  
Defendant. )

**PLAINTIFFS' DESIGNATION OF KATHRYN L. DOESCHOT MSN RN CRRN  
AS AN EXPERT WITNESS**

The Plaintiffs wherewith designate Kathryn L. Doeschot as an expert witness. Ms. Doeschot can testify as to her knowledge, background, experience and education as an

expert in life care planning for injured patients such as James Gould. Plaintiffs' Exhibit 178 hereto is her curriculum vitae, which includes her educational presentations and writings. Plaintiffs' Exhibit 179 is Ms. Doeschot's list of charges and fees for depositions and record review. Plaintiffs' Exhibit 180 is the list of recent cases in which Kathryn L. Doeschot has testified in as an expert witness. She has based her life care plan upon the IME reports of Dr. Robin R. Ockey and Dr. Jonathan Woodcock, as well as telephone interviews with Mr. Gould and his wife, Erin, and telephone interviews with Dr. Ockey and a personal conference meeting with Dr. Woodcock. She also reviewed the Neuropsychological Consultation Report dated 10/23/07 prepared by Dr. Erin Bigler. Plaintiffs' Exhibit 181 comprises her written report including ascertainment of the costs of the projected future medical care. Her report has attachments for cost projection and a pricing worksheet. The report also sets out the bases upon which her opinions are posited.

Dated: this 16<sup>th</sup> day of July, 2008.

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/s/ Stephen L. Simonton

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CERTIFICATE OF SERVICE

I, Stephen L. Simonton, hereby certify that on this 16<sup>th</sup> day of July, 2008, I served a true and correct copy of the foregoing *Plaintiffs' Designation of Kathryn L. Doeschot MSN RN CRRN as an Expert Witness* by filing it with the Clerk of Court using the CM/ECF system which will send notification to counsel for the Defendant at the following e-mail address and also mailed by U.S. Mail:

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